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jgardner@mcguirewoods.cor

January 17, 2019

VIA ELECTRONIC FILING

Ms. Jocelyn G. Boyd Chief Clerk and Administrator The Public Service Commission of South Carolina Synergy Business Park 101 Executive Center Drive Columbia, South Carolina 29210

Re: GCRM-148, Docket No. 2006-401-G

Dear Ms. Boyd:

On behalf of Piedmont Natural Gas Company, Inc. ("Piedmont"), I have enclosed various schedules constituting Piedmont's GCRM-148.

The rate changes reflected in this filing, as shown on the attached schedules, are necessary to update Piedmont's rates to reflect changes in Piedmont's wholesale costs of gas. Wholesale futures contract prices for natural gas deliveries, as reflected on the New York Mercantile Exchange, are currently at levels below the \$3.75 per dekatherm commodity cost of gas reflected in Piedmont's rates.

Based on the differential between Piedmont's existing benchmark cost of gas and the futures wholesale price, as well as the current balance in its deferred gas cost account, Piedmont is at risk of over-collecting its wholesale gas costs if the benchmark cost of gas reflected in its rates is not decreased to \$3.00 per dekatherm as proposed herein. The relief requested herein will mitigate such over-collection and will also ensure that the wholesale gas costs reflected in Piedmont's rates are reasonably consistent with the prevailing market price for natural gas, thereby avoiding the creation of artificial market signals/incentives to parties who utilize this commodity for fuel or process purposes. The rate changes proposed herein are a decrease of \$0.07633/therm for sales rate schedules (201, 202, 242, 252, 203 and 204) and a decrease of \$0.00133/therm for transportation rate schedules (213 and 214).

Piedmont hereby requests approval of this GCRM filing in time to implement these rate changes effective with the first billing cycle in February, 2019.

Ms. Jocelyn G. Boyd January 17, 2019 Page 2

If you have any questions regarding this matter, you may reach me at the number shown above.

Sincerely,

/s/ Jasmine K. Gardner

Jasmine K. Gardner

Enclosures

cc: Bruce Barkley

Pia Powers Brian Heslin Jim Jeffries

Office of Regulatory Staff (via email and overnight delivery)

STATE OF NORTH CAROLINA

VERIFICATION

COUNTY OF MECKLENBURG

Kally A. Couzens, being duly sworn, deposes and says that she is Rates & Regulatory Strategy Manager – Regulatory Affairs of Piedmont Natural Gas Company, Inc., that as such, she has read the foregoing and knows the contents thereof; and she believes that the facts set forth therein are true and correct.

Kally A. Couzens

Mecklenburg County, North Carolina Signed and sworn to before me this day by Janet P. Cureton

Date: 01/16/2019

Notary Public

JANET P CURETON NOTARY PUBLIC Mecklenburg County State of North Carolina My Commission Expires:

March 01/200

Schedule A

Schedule A Page 1 of 2

		(a)	(b) GCRM-148	(c)	
		January 2019 Current	COG Commodity Rate	February 2019 Proposed	
Rate Schedules:		Billing Rates ¹	<u>Change</u>	Billing Rates	
201	Residential Service				
	Monthly Charge-winter	10.00	-	10.00	
	Monthly Charge-summer	8.00	-	8.00	
	Winter (NovMar.) per therm	0.88205	(0.07633)	0.80572	
	Summer (AprOct.) per therm	0.83864	(0.07633)	0.76231	
202	Small General Service				
	Monthly Charge	22.00	-	22.00	
	Winter (NovMar.) per therm	0.79758	(0.07633)	0.72125	
	Summer (AprOct.) per therm	0.78666	(0.07633)	0.71033	
252	Medium General Service				
	Monthly Charge	75.00	(0.07000)	75.00	
	Winter (NovMar.) per therm	0.76633	(0.07633)	0.69000	
242	Summer (AprOct.) per therm	0.75541	(0.07633)	0.67908	
242	Natural Gas Vehicle Fuel Service Winter (NovMar.) per therm	0.67347	(0.07633)	0.59714	
	Summer (AprOct.) per therm	0.67347	(0.07633)	0.59714	
	Winter (NovMar.) per GGE ²	0.84857	(0.07033)	0.75240	
	* * * * * * * * * * * * * * * * * * * *				
242	Summer (AprOct.) per GGE ²	0.84857		0.75240	
243	Experimental Motor Vehicle Fuel Service Monthly Charge				
	Winter (NovMar.)				
	Summer (AprOct.)				
203					
	Monthly Charge	250.00	-	250.00	
	Billing Demand per therm	1.10000	-	1.10000	
	Winter (NovMar.) per therm				
	First 15,000	0.61281	(0.07633)	0.53648	
	Next 15,000	0.54710	(0.07633)	0.47077	
	Next 75,000	0.49907	(0.07633)	0.42274	
	Next 165,000	0.45283	(0.07633)	0.37650	
	Next 330,000	0.40569	(0.07633)	0.32936	
	Over 600,000	0.38212	(0.07633)	0.30579	
	Summer (AprOct.) per therm	0.50050	(0.07000)	0.40000	
	First 15,000	0.53853	(0.07633)	0.46220	
	Next 15,000	0.49140	(0.07633)	0.41507	
	Next 75,000	0.46193	(0.07633)	0.38560 0.35793	
	Next 165,000 Next 330,000	0.43426 0.40569	(0.07633) (0.07633)	0.32936	
	Over 600,000	0.38212	(0.07633)	0.30579	
204	Interruptible Sales Service	0.00212	(0.07000)	0.00073	
	Monthly Charge	250.00	_	250.00	
	Winter (NovMar.) per therm				
	First 15,000	0.63781	(0.07633)	0.56148	
	Next 15,000	0.57210	(0.07633)	0.49577	
	Next 75,000	0.52497	(0.07633)	0.44864	
	Next 165,000	0.47933	(0.07633)	0.40300	
	Next 330,000	0.42969	(0.07633)	0.35336	
	Over 600,000	0.40712	(0.07633)	0.33079	
	Summer (AprOct.) per therm				
	First 15,000	0.56353	(0.07633)	0.48720	
	Next 15,000	0.51640	(0.07633)	0.44007	
	Next 75,000	0.48783	(0.07633)	0.41150	
	Next 165,000	0.46076	(0.07633)	0.38443	
	Next 330,000	0.42969	(0.07633)	0.35336	
205	Over 600,000 Outdoor Gas Light Service	0.40712	(0.07633)	0.33079	
200	Dor Fixture/Mo	15.00		15.00	

15.00

15.00

Per Fixture/Mo.

		(a)	(a) (b) GCRM-148		
		January 2019 Current	COG Commodity Rate	February 2019 Proposed	
Rate Schedules:		Billing Rates ¹	Change	Billing Rates	
213	Large General Transportation Service				
	Monthly Charge	250.00	-	250.00	
	Standby Demand per therm	0.45000	-	0.45000	
	Billing Demand per therm	0.80000	-	0.80000	
	Winter (NovMar.) per therm				
	First 15,000	0.21181	(0.00133)	0.21048	
	Next 15,000	0.15010	(0.00133)	0.14877	
	Next 75,000	0.10937	(0.00133)	0.10804	
	Next 165,000	0.06783	(0.00133)	0.06650	
	Next 330,000	0.02609	(0.00133)	0.02476	
	Over 600,000	0.00712	(0.00133)	0.00579	
	Summer (AprOct.) per therm				
	First 15,000	0.13753	(0.00133)	0.13620	
	Next 15,000	0.09440	(0.00133)	0.09307	
	Next 75,000	0.07223	(0.00133)	0.07090	
	Next 165,000	0.04926	(0.00133)	0.04793	
	Next 330,000	0.02609	(0.00133)	0.02476	
	Over 600,000	0.00712	(0.00133)	0.00579	
214	Interruptible Transportation Service				
	Monthly Charge	250.00	-	250.00	
	Winter (NovMar.) per therm				
	First 15,000	0.22781	(0.00133)	0.22648	
	Next 15,000	0.16710	(0.00133)	0.16577	
	Next 75,000	0.11497	(0.00133)	0.11364	
	Next 165,000	0.07383	(0.00133)	0.07250	
	Next 330,000	0.03269	(0.00133)	0.03136	
	Over 600,000	0.00712	(0.00133)	0.00579	
	Summer (AprOct.) per therm				
	First 15,000	0.15353	(0.00133)	0.15220	
	Next 15,000	0.11140	(0.00133)	0.11007	
	Next 75,000	0.07783	(0.00133)	0.07650	
	Next 165,000	0.05526	(0.00133)	0.05393	
	Next 330,000	0.03269	(0.00133)	0.03136	
	Over 600,000	0.00712	(0.00133)	0.00579	

^{1/} The rates in Column (a) are the same as those shown in the Company's Etariff filing revision #E2018-294 (version 30) approved on 12/19/18.

^{2/} The rates convert 1.26 therms to 1 GGE.

Schedule B

Piedmont Natural Gas Company, Inc. State of South Carolina Commodity Cost of Gas Calculation Docket No. 2006-401-G GCRM - 148 Schedule B Page 1 of 1

	Annualized Throughput (DT) per Docket 2018-7-G Settlement Approved on 10/3/2018, Order No. 2018-679	Proposed Commodity Rate per (DT)			<u>Total</u>
Sales	15,337,035	\$	3.00	\$	46,011,105
Transportation	5,610,407				
Total Throughput	20,947,442				
LAUF %	1.77%				
Company Use & Lost And Unacct For	370,770	\$	3.00	\$	1,112,310
Total Throughput					20,947,442
Calculated Rate - LAUF					0.0531
Proposed Sales Commodity Rate per DT Proposed Sales Commodity Rate per Therm Current Sales Commodity Rate per Therm Adjustment to Sales Commodity Rate per Therm				\$ \$ \$	3.05310 0.30531 0.38164 (0.07633)
Proposed Transportation Commodity Rate por Proposed Transportation Commodity Rate por Current Transportation Commodity Rate per Adjustment to Transportation Commodity Rate	er Therm Therm			\$ \$ \$	0.05310 0.00531 0.00664 (0.00133)
Current Benchmark Proposed Benchmark				\$ \$	3.75 3.00

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached document is being served this date via email and FedEx Overnight upon:

Jeffrey M. Nelson
Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, South Carolina 29201
jnelson@regstaff.sc.gov

And that a copy of the attached document is being served this date via email or U.S. Mail upon:

Bruce Barkley
Vice President
Regulatory and Community Relations
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, North Carolina 28233
bruce.barkley@piedmontng.com

and

Pia Powers

Director – Gas Rates & Regulatory Affairs
Piedmont Natural Gas Company, Inc.
P.O. Box 33068

Charlotte, North Carolina 28233
pia.powers@piedmontng.com

This the 17th day of January, 2019.

/s/ Richard K. Goley Richard K. Goley